



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

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OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

FEB 9 1990

MEMORANDUM

SUBJECT: Summary Notes from Meeting with the Wood Preservative Industry on the Consumer Awareness Program

FROM: Spencer L. Duffy, Review Manager *S.L.D.*  
Special Review Branch  
Special Review and Reregistration Division (H7508C)

TO: Addressees/Attendees

The wood preservative team met with representatives from the wood preservative industry on January 23, 1990. The purpose of the meeting was to review the results of the 1989 audit of the Consumer Awareness Program (CAP). This program is designed to inform consumers of the safety precautions that should be observed when using, handling, and disposing of treated wood.

The CAP was established as a result of a 1985 settlement agreement between EPA, the wood preservative pesticide manufacturers, and the wood treaters industry following issuance of the final determination (Position Document No. 4) for the three major wood preservatives, creosote, pentachlorophenol, and the inorganic arsenicals.

Results from the 1989 audit were similar to results from past audits. The 1989 audit showed a high level of compliance at the wood treater and formulator levels but a lower level of compliance at the wholesale/distributor and retailer level of the trade channel.

Following the review and discussion of the 1989 audit, the representatives from the wood treating industry presented elements of a new approach to the 1990 audit. This approach would include a wider use of the media to disseminate information about treated wood, the use of "focus" groups to gather information on public knowledge about treated wood, encouragement for wood treaters to continue the practice of stamping their products with a notice alerting buyers to ask for consumer information and continuation of the speakers bureau where managers reach out to the community by giving seminars and lectures on how to safely use treated wood. (Some managers have received awards from the wood treating industry for their efforts.)

The team member from the Office of Toxic Substances (OTS) expressed his concern (the same as had been expressed by the team in previous audit reviews) regarding the lack of information at the end-user level and the very low level of compliance shown for carpenters in the 1987 audit. He also indicated that OTS was concerned that there may be groups at risk that had not been identified. OTS has reviewed OPP's data base and is reviewing its options for data collection, assessing risks, and possible rulemaking under the Toxic Substances Control Act (TSCA).

The wood preservative team and representatives from the wood treaters industry agreed that current and past audits had consistently yielded limited results and that more meaningful information was needed, particularly at the end-user level, to adequately assess the effectiveness of the CAP. Accordingly, a new approach to the 1990 audit would be appropriate.

The wood preservative team recommended that, in addition to the above innovations presented by the wood treaters industry, the 1990 audit should include: 1) a revisit to the establishments that were audited for the past 3 years to ascertain their current level of compliance; 2) an exemption for the wood treaters and formulators who have consistently shown a very high level of compliance (100%); and 3) the addition of carpenters and perhaps building contractors and homeowners in the 1990 audit mix.

Following ample discussion of each of the recommendations, the wood preservative industry representatives agreed to draft the plans for the 1990 audit based on the above recommendations and present them to the EPA team for review in March. However, the representatives expressed concerns that the money available to conduct a 1990 audit would not be sufficient to cover the expenses involved with the above three requests and that their proposal back to the Agency would likely be a modification of these requests.

The meeting was adjourned at 12:10 p.m.

Addressees/Attendees

Dave Albright✓	OTS/CCD	245-4028
Pat Hamilton✓	AWPI	893-4005
John Hall	AWPI	893-4005
Mark Gallant	NLDA	547-2230
George Eliades	SAWP	237-0900
Cara Jablon✓	OGC	382-7522
David Stangel✓	OCM/OPTS	382-3477
Sidney Jackson✓	OPP/FHB	557-8610
Jack Housenger✓	OPP/SRB	557-2711
Spencer L. Duffy	OPP/SRB	557-1529